

Jury Questionnaire

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Judge Michael E. Farbiarz

**Please answer each question. For each question, please check
yes or no.**

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This jury questionnaire concerns a criminal case for which jurors are being selected.

An indictment is a formal document that begins a criminal case. It is not evidence.

In this case, the indictment alleges the following:

The Defendants, Gordon Coburn and Steven Schwartz, allegedly authorized an improper \$2 million payment to one or more Indian government officials. This payment was allegedly made to obtain a permit needed by their company to build an office facility in India. And that, it is alleged, violated United States criminal law in a number of ways, including by violating the Foreign Corrupt Practices Act.

The defendants deny the allegations against them.

They are presumed innocent.

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1. The judge in this case is United States District Judge Michael E. Farbiarz.

Do you know him or any of his family members?

Yes

No

2. The defendants in this case are Gordon J. Coburn and Steven Schwartz.

Do you know either of them or any of their family members?

Yes

No

3. The United States in this case is represented by: Keith Edelman, Connor Mullin, Paul Ream, and Rachelle Navarro, who will be assisted by paralegal specialists Christa Reed and Angelina Tyler.

Gordon J. Coburn is represented by: James Loonam, Henry Klehm, Hank Walther, and Sarah Efronson of Jones Day.

Steven Schwartz is represented by: Ted Wells, Roberto Finzi, and Justin Lerer of Paul, Weiss, Rifkind, Wharton & Garrison LLP; Larry Lustberg of Gibbons P.C.; and Jeremy Bohrer of Bohrer PLLC.

Do you know any of these people or any of their family members?

Yes

No

4. At any point have you or anyone in your family worked for either the United States Attorney's Office or for any of the law firms mentioned above?

Yes

No

5. You may hear the following entities mentioned during this trial or called as witnesses.

[parties to add]

Are you familiar with any of them?

Yes

No

6. You may hear the following individuals mentioned during this trial or called as witnesses.

- Deepa Baburaaaj
- Dr. David Becker
- Anthony Bellitti
- Manu Bhatia
- Anand Bhushan
- Kelly Blanchfield
- Maureen Breakiron-Evans
- Karl Buch
- Steven Casari
- Gaurav Chatterjee
- Brackett Denniston
- Dr. Kip Dolphin
- Francisco ("Frank") D'Souza
- Shawn Fohs
- Daniella Ganiaris
- P. Ganesh
- Biswajit Ghosh ("B.G.")
- Arnab "Raj" Ghosh
- Dana Gilbert
- Charles Goodsell
- Nagasubramanian Gopalakrishnan
- Peter Haas
- Brett Harrison
- Kyle Heath
- Leslie John
- Phanindra Kaza
- Natasha Kanerva
- Timothy Kistner
- John Klein
- T. Nanda Kumar
- David Last
- Karen McLoughlin
- Rajeev Mehta
- Alan Nadel
- Venkatesan Natarajan
- Lakshmi Narayanan
- David O'Neil
- Ganesh Paramasivam ("P. Ganesh")
- Todd Rahn
- Srimanikandan Ramamoorthy
- Joshua Rievman
- Dr. Bruce Robinson

- Dr. Paul Robinson
- Narsingarao Sardee
- Debra Schwartz
- Tyler Scott
- Chandra Sekaran
- Riz Shah
- Manivannan Shanmugam
- Henry Shiembob
- Jason Sims
- Colby Smith
- Balaji Subramanian
- S.N. Subramanian
- Grayson Stratton
- Robert Telesmanic
- Sridhar Thiruvengadam
- Adimoolam Thiyagarajan
- Ashok Upadhyay
- Ramesh Vadivelu
- Eric Westphal
- Mark Zmijewski

Do you know any of them?

Yes

No

7. At the trial, there may be testimony from people employed by various law-enforcement agencies, including:

- Department of Justice [?]
- Federal Bureau of Investigation
- U.S. Securities & Exchange Commission [?]

Based on direct personal experience, do you have any opinions about any of these agencies?

Yes

No

8. Have you or anyone in your family ever worked for one of

these agencies?

Yes

No

9. Have you or anyone in your family been the victim of crime or fraud?

Yes

No

10. All jurors are required to consider the evidence presented to them in a fair and impartial way.

Do you have any doubts about your ability to do this?

Yes

No

11. All jurors are required to take legal instruction from the Court.

Do you have any doubts about your ability to take legal instruction from the Court?

Yes

No

12. All jurors must assess the evidence in a way that is not impacted in any way by the race, gender, ethnicity, national origin, or religion of the defendants, the witnesses, or the lawyers.

Do you have any doubts about your ability to do that?

Yes

No

13. Would you be able to fairly and impartially assess the credibility of an executive of a large corporation and the case against him?

Yes

No

14. Would you be able to fairly and impartially assess the credibility of a lawyer who works for a large corporation and the case against him?

Yes

No

15. Do you have any beliefs or convictions, whether moral, religious, philosophical, or otherwise, that would make it difficult for you to be a fair and impartial juror in this case or to sit in judgment of the defendants?

Yes

No

16. The defendants are presumed innocent and cannot be convicted unless the jury unanimously, and based only on the evidence presented in Court, decides that the United States has proven guilt beyond a reasonable doubt.

Do you have any doubts about your ability to follow this legal principle?

Yes

No

17. U.S. law makes it illegal in certain circumstances to bribe officials of foreign governments, including foreign

government officials who work entirely outside of the United States.

Do you have any doubts about your ability to apply this law fairly and impartially, and to follow the Court's instructions about this law, including as to its geographic scope?

Yes

No

18. If you are selected to serve as a juror in this case, you must render a verdict based solely on the evidence presented in Court and the law as the Court will instruct you, and you must disregard any other ideas, notions, opinions, or beliefs about the law that you may have.

Do you have any doubts about your ability to do that?

Yes

No

19. Have you read, seen, or heard anything about this case before today?

Yes

No

20. Do you have any experience with the Foreign Corrupt Practices Act or any opinions about it?

Yes

No

21. Have you been to India or done business with Indian

companies?

Yes

No

22. Any trial might potentially generate some media attention.

If this one does, you must avoid reading, watching, or listening to reports concerning this case until it is over.

Do you have any doubts about your ability to do that?

Yes

No

23. This trial will run for six weeks, the weeks of March 3, March 10, March 17, March 24, March 31, and April 7.

Each juror must be present for each trial day. And each juror must be present throughout each trial day.

The trial day runs from 9:00 a.m. to 4:00 p.m., Monday, Tuesday, Wednesday, Thursday, and Friday.

But most weeks, the Court will add in a day off, so that people have a chance to attend to other things.

Do you have any scheduling conflicts --- such as already-arranged travel plans, already-scheduled important medical appointments, or other major events --- that would prevent you from serving on the jury?

Yes

No

24. Do you serve as the primary caretaker for any relatives, which would require your presence at home and prevent you from serving on the jury?

Yes

No

25. Are there any other important issues that would make it impossible or extremely difficult for you to attend the trial each day during the hours mentioned above?

Yes

No

26. Are there any medical or health conditions that will make it hard for you to focus on the evidence throughout a trial day?

Yes

No

27. The trial will be in English.

Do you have any doubts about your ability to understand the English language?

Yes

No

28. Is there any other matter that you feel may have some bearing on your qualifications as a juror?

Yes

No